

PETER Y. LEE
ATTORNEY AT LAW

770 RIVER ROAD (212) 808-0716 TEL
P.O. Box 52 (212) 808-0719 FAX
EDGEMEWER, NJ 07020 PETER.LEE@LEEADVOCATES.COM

August 11, 2023

Hon. Katharine S. Hayden, U.S.D.J.
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re Sehoon Chang vs. Able C&C Co. Ltd.
D.N.J. Case 2:23-cv-02590-KSH-JRA**

Dear Judge Hayden:

On behalf of Plaintiff, Mr. Sehoon Chang, we respectfully request a 30-day extension of time to serve process or until the Court decides our ECF 6 application for substituted service, whichever is later.

We filed our complaint May 12, 2023. (ECF 2-1.) Under Fed. R. Civ. P. 4(m), Plaintiff's complaint is subject to dismissal "within 90 days" of filing. For good cause shown in our motion for substituted service, including our unavailing efforts to obtain Defendant's waiver of service, we ask for the Court's patience and understanding. As we explain in our moving papers, Defendant is a South Korea corporation with a principal place of business outside the United States.

We thank the Court for Your Honor's valuable consideration.

Respectfully,

/s/ Peter Y. Lee

PETER Y. LEE

PYL/ddh